

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ROBERT LEE RUSZKOWSKI, JR., DANA	)	
RENEE GRIFFITH, and JILL KATHLEEN	)	
KING,	)	
	)	
Plaintiffs,	)	Case No. 18-CV-5754
	)	
v.	)	
	)	Honorable Sharon J. Coleman
DALE JAMES MORGADO,	)	
	)	
Defendant.	)	
	)	

**MOTION FOR ALTERNATIVE SERVICE AND  
FOR EXTENSION OF TIME TO EFFECTUATE SERVICE**

Plaintiffs Robert Lee Ruszkowski, Jr., Dana Renee Griffith, and Jill Kathleen King, by and through their attorneys, Actuate Law LLC, hereby move this Court to enter an order approving an alternative form of service and granting an extension of time to effectuate service upon Defendant Dale James Morgado (“Morgado”) and in support thereof, states as follows:

On August 22, 2018, Plaintiffs filed a one-count complaint against Attorney Dale James Morgado (“Morgado”) for negligence. Plaintiffs have since made a diligent inquiry to identify the location of Morgado and have made reasonable efforts to serve Morgado at fourteen different addresses in three states, but have been unsuccessful. Federal Rule of Civil Procedure 4(m) requires that a defendant be served with the summons and complaint no later than ninety (90) days after the complaint is filed. The deadline to serve Morgado is currently November 20, 2018. For the reasons set forth in the accompanying Memorandum of Law in Support of this Motion, Plaintiffs request that this honorable Court enter an order: (1) granting the proposed alternative

method(s) of service upon Morgado; and (ii) extending the deadline to serve Morgado as prescribed by Federal Rule of Civil Procedure 4(m).

WHEREFORE, Plaintiffs Robert Lee Ruszkowski, Jr., Dana Renee Griffith, and Jill Kathleen King, respectfully requests this Court enter an order granting the proposed alternative method(s) of service upon Defendant Dale James Morgado and extending the deadline to effectuate service, and grant any other form of relief as this Court deems just and proper.

November 14, 2018

s/ Andrea C. Halverson

Dara C. Tarkowski  
Andrea C. Halverson  
ACTUATE LAW, LLC  
641 W. Lake Street  
Chicago, IL 60661  
(312) 579-3108  
dara.tarkowski@actuatelaw.com  
andrea.halverson@actuatelaw.com

*Attorneys for Plaintiffs*